ORIGINAL

NO. 85-6956

IN THE

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM 1985

LEVIS LEON ALDRICH,

Petitioner,

v.

LOUIE L. WAINWRIGHT, Secretary,
Florida Department of Corrections,

Respondent.

ON PETITION FOR WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

RESPONDENT'S BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

I.

WHETHER THE ELEVENTH CIRCUIT CORRECTLY APPLIED THE STANDARDS OF STRICKLAND v. WASHINGTON, ___ U.S. ___, 80 L.ED.2D 674 (1984), IN REJECTING THE PETITIONER'S CLAIM OF INEFFECTIVE COUNSEL?

II.

WHETHER THE STATE AND FEDERAL COURTS HAVE CORRECTLY FOUND THAT PROCEDURAL DEFAULT BARS THE PETITIONER'S CLAIM REGARDING THE SENTENCER'S ALLEGED FAILURE TO CONSIDER A NON-STATUTORY MITIGATING CIRCUMSTANCE?

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OPINIONS BELOW

The Petitioner has accurately cited the opinions below.

JURISDICTION

The Respondent accepts the Petitioner's jurisdictional statement.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

In addition to the Petitioner's citation to the Sixth and Fourteenth Amendments, the Eighth Amendment to the United States Constitution provides, in pertinent part:

> . . . nor cruel and unusual punishments inflicted.

STATEMENT OF THE CASE

A. Preliminary Statement

The Petitioner was the Petitioner-Appellant in the Eleventh Circuit Court of Appeals and the Petitioner

in a habeas corpus proceeding brought pursuant to 28 U.S.C. §2254 in the United States District Court for the Southern District of Florida. In this pleading, the parties will be referred to as they appear before this Honorable Court.

The following symbols will be used:

"RA"	The Record on Appeal in the Eleventh Circuit;
"R"	The Record on Appeal in the Florida Supreme Court on direct appeal;
"T"	Transcript of the state trial and sentencing;
"RH"	Record on Appeal to the Florida Supreme Court from the denial of post-conviction relief; and
"TH"	Transcript of the state post-conviction hearing

B. History of the Case

The Respondent accepts the Petitioner's statement regarding the course of the prior proceedings found at pages 2-3 of the petition as generally accurate. Respondent would add that the Eleventh Circuit panel divided only on the ineffective counsel claim. The dissenting judge did not comment on the issue regarding the sentencer's alleged failure to consider a non-statutory mitigating factor.

C. Statement of the Facts

1. The Evidence at Trial

The Petitioner was charged by an indictment filed October 17, 1974, with the capital crime of first degree murder (R 1). His trial commenced on January 6, 1975. The State, through direct and circumstantial evidence, proved the Petitioner personally killed the victim, Robert Ward, in the course of a robbery.

The first witness to testify was Lynn Ward,

the victim's widow (T 218). She testified her husband called her at 12:05 a.m. on September 3, 1974, to let her know he was leaving DiVagno's restaurant, where he worked (T 219). Deputy William Boyd was dispatched to DiVagno's restaurant to respond to a burglar alarm at 12:14 a.m. (T 223), and he arrived at 12:19 a.m. (T 224). The victim's body was lying outside the restaurant (T 231). Three spent shotgun shells were recovered near the body (T 271).

Joyce Marshall, a security guard, testified at about 1:00 a.m. on September 3 she saw a car pull off from Central Trucking (T 280). The car, a white Chrysler (T 284), headed towards her (T 281). She pulled out her gun and when the driver, who appeared to be the Petitioner, saw it, he took off (T 282, 283).

Deputy Walters stopped a white Chrysler driven by the Petitioner at about 2:00 a.m. due to the fact that it drove slowly by the restaurant where the crime had occurred (T 291, 294). The Petitioner had between five and six hundred dollars, including a lot of one dollar bills, stuffed into his four pockets (T 295). The Petitioner said he had just gotten out of prison and he had a Department of Corrections receipt for $558.58 (T 299). He also had a receipt showing he had paid $200 for his car (T 300).

Al DiVagno, the owner of the restaurant, testified he opened its door to let the police in (T 306). The lights were on in the kitchen, the office door was open, and the carpet was pulled back, exposing the empty, open safe (T 307). No one other than DiVagno and the victim knew the combination (T 307). Between six and nine hundred dollars had been taken, based on the fact that fifty-eight dinners had been served that evening (T 309, 321). The burglar alarm to the office door was set, but not to the back door (T 312). Mr. DiVagno knew the Petitioner, who had worked for him at the restaurant as a dishwasher earlier in 1974 (T 315).

He had been fired for exceeding his authority (T 317).

James Sapp was the Petitioner's roommate in prison, and knew the Petitioner was working at DiVagno's restaurant while he was in work release (T 332-333). The Petitioner told Sapp he planned to rob the place; he had set the burglar alarm once to see how long it would take the police to get there and it took fifteen minutes (T 335).

Charles Strickland also met the Petitioner in prison. They had both been released, and on September 2 the Petitioner called and asked Strickland if he could borrow a gun to go deer hunting (T 344-345). Strickland agreed, and he met the Petitioner at a parking lot and lent him a gun and five shells (T 347-348). Later that evening, Strickland drove someone to the hospital during the hours of midnight to 1:00 a.m. (T 351-352). At 1:30 a.m., after he had returned home, Strickland got a telephone call from the Petitioner, who said he had had to kill a man (T 352). The following day, the Petitioner called Strickland again and asked him to help him recover the gun from Central Truck Lines (T 353, 355). The Petitioner told Strickland he killed a man at DiVagno's restaurant because the man had tried to pull off his mask (T 355). Strickland disposed of the gun (T 357) but subsequently he showed the police where it was (T 374).

Anita Sapp and Jewel Sapp, two girls who lived in the house where Strickland was staying, testified they saw Strickland give his gun to a man on September 2 (T 393-394; 400-402). Jewel Sapp testified Strickland told them the man was Aldrich (T 404).

Lillie King testified Charles Strickland drove her to the hospital at 11:50 p.m. on September 2 and dropped her off at 12:40 a.m. on September 3 (T 409).

Richard Turnipseed, a job placement officer for the Department of Corrections work release program,

testified the Petitioner was paroled on August 26, 1974 (T 422). He received a check for $558.58 on August 27 (T 424). George Osborne, a car salesman, testified the Petitioner purchased a 1963 Chrysler on August 27 for $200 (T 442).

William Rathman, a firearms examiner, testified the shotgun submitted to him for testing had fired the three shells recovered from the crime scene (T 482). This shotgun was found on September 9, 1974, in a canal; Charles Strickland took the police to it (T 490).

Annie Mae Edwards, a cook at DiVagno's restaurant, testified she had worked with the Petitioner (T 501). He told her when he got out of prison he was going to rob the restaurant (T 504).

It was stipulated by the State and defense that the victim, Robert Ward, named in the indictment, was dead as the result of gunshot wounds (T 508).

After the State rested (T 512), the Petitioner testified and claimed an alibi. He asserted that on September 2 he went fishing until about 10:30 or 11:00 p.m. (T 517). He then went to Jo Ann's quarter bar until 1:30 or 2:00 a.m. (T 518). When he was stopped by the police, he was on his way to visit his landlady (T 519).

The jury returned a verdict finding the Petitioner guilty as charged (T 725-726).

2. The Evidence at the Post-Conviction Relief Hearing

In December, 1981, the state trial court held an evidentiary hearing on the Petitioner's claim of ineffective counsel.

Willie Gary, an attorney who was admitted to the Florida Bar on December 20, 1974, testified he began working for the Public Defender's Office as an intern in September, 1974 (TH 110). He was assigned to assist the

Public Defender, Elton Schwartz, with the Petitioner's case (TH 112-113). Mr. Gary worked with the office's investigator, Mr. Coppick, in preparing the case (TH 113, 115). Although depositions were not taken, the prosecutor had furnished statements from the State's witnesses (TH 117-118). At trial, the decision was made not to call defense witnesses in order to have opening and closing argument (TH 123). Mr. Gary stated he could not recall any of the State's evidence having caught the defense by surprise (TH 144).

Elton Schwartz, the Public Defender, testified the decision was made not to put on alibi witnesses because they were not exact enough, so it was preferable to preserve the right to give the closing argument (TH 183). The only surprise at trial occurred during the penalty phase during Sergeant Boyd's testimony concerning Jo Ann DeSamarais (TH 198). Mr. Schwartz was unable to give any specific examples as to how taking depositions would have affected the outcome (TH 200). Although it was a circumstantial evidence case, "there were too many circumstances there" (TH 226).

REASONS FOR DENYING THE WRIT

I.

THE COURT BELOW CORRECTLY APPLIED THE STANDARDS OF STRICKLAND v. WASHINGTON, ___ U.S. ___, 80 L.ED.2D 674 (1984), IN REJECTING THE PETITIONER'S CLAIM OF INEFFECTIVE COUNSEL.

The Petitioner asserts the Eleventh Circuit incorrectly applied the prejudice component of Strickland v. Washington, ___ U.S. ___, 80 L.Ed.2d 674 (1984), by requiring proof of affirmative evidence of innocence. On the contrary, the court correctly used the Strickland analysis, and concluded there was no prejudice sufficient

to undermine confidence in the outcome. The court merely pointed out that the Petitioner has never shown what more could have been done that would have affected the result of his trial. This is not tantamount to requiring evidence of innocence.

The basis of the Petitioner's claim is his counsel lacked time to investigate and depose witnesses because the court denied his motion for a continuance. In Morris v. Slappy, 461 U.S. 1 (1983), this Court held that not every restriction on counsel's time or opportunity to investigate, consult with his client, or otherwise prepare for trial violates a defendant's Sixth Amendment right to counsel. In the instant case, although the State's witnesses were not deposed, the Petitioner's case was investigated prior to trial. The State, in opposing the defense motion for continuance, noted it had furnished sworn statements of the material witnesses to the Public Defender in October, 1974, and the prosecutor had reviewed the evidence with the Public Defender's chief investigator (R 35-37). Willie Gary, a legal intern who had assisted the Public Defender in the preparation and trial, testified at the Petitioner's 1981 post-conviction evidentiary hearing that he worked in conjunction with the Public Defender's investigator, Mr. Coppick (TH 113-115). They had been furnished by the prosecutor with statements of the witnesses (TH 118), and Mr. Gary did not recall any of the State's evidence taking the defense by surprise at trial even though no depositions were taken (TH 144). A tactical decision was made not to call defense witnesses in order to have closing argument (TH 123).

Elton Schwartz, the Public Defender of the Nineteenth Judicial Circuit, testified the only surprise at trial was as to Sergeant Boyd's testimony during the penalty phase regarding a hearsay statement of Jo Ann

DeSamarais (TH 198). Mr. Schwartz was aware of what Ms. DeSamarais would testify, and decided not to call her because her testimony would not establish the Petitioner's alibi and he decided it would be preferable to preserve the right to closing argument (TH 183, 201, 211). Mr. Schwartz was unable to cite any specific instances to show that depositions would have affected the outcome (TH 200).

Thus, it is clear the Eleventh Circuit correctly held that this is not the type of case discussed in United States v. Cronic, ___ U.S. ___, 80 L.Ed.2d 657 (1984), where prejudice can be inferred. Rather, the ineffective counsel claim was properly addressed under the prejudice standard of Strickland v. Washington.

Although the Petitioner repeatedly asserts the State's case was weak, the Respondent must disagree. The evidence points unerringly to the Petitioner. As his lawyer stated in the post-conviction evidentiary hearing ". . . even though it was a circumstantial evidence case, there were too many circumstances there." (TH 226).

The evidence definitively established that the murder occurred between 12:05 a.m. and 12:14 a.m.: the victim's widow testified her husband called her from the restaurant at 12:05 (T 219) and Deputy Boyd was dispatched to respond to the restaurant's burglar alarm at 12:14 (T 223). The police were still at the scene around 2:00 a.m. when the Petitioner drove by slowly (R 291, 294). The Petitioner had between five and six hundred dollars in cash stuffed into all four of his pockets, including a lot of one dollar bills (T 295). The restaurant owner testified between six and nine hundred dollars was taken (T 309). The Petitioner told the police he had gotten the money when he was released from prison, and showed them a Department of Corrections receipt for $558.58 (T 299). He had spent $200 to buy a car (T 300, 442).

Al DiVagno, the owner of the restaurant, testified the Petitioner had been employed there as a dishwasher earlier in the year while on work release and was familiar with the operation (T 315-316). He had been fired for exceeding his authority (T 317). Annie Mae Edwards, a cook at the restaurant, testified the victim was friendly to the Petitioner while he was an employee and taught him about the business (T 502). The Petitioner told her when he got out of prison he would rob the restaurant and some other places around town; he would be able to keep the alarm from going off (T 503). James Sapp, who knew the Petitioner in prison, testified the Petitioner told him he planned to rob the restaurant (T 332-335).

Charles Strickland met the Petitioner in prison (T 342). After they were both released, Strickland testified the Petitioner called him around 7:00 p.m. on September 2 and asked to borrow his gun so he could go deer hunting (T 344-345). Strickland agreed, and he drove to the Fort Pierce hotel parking lot where he gave the Petitioner a gun and five shells (T 348). This part of Strickland's testimony was corroborated by Anita Sapp, age nine, and Jewel Sapp, age fourteen. Anita testified Strickland was staying at her house (T 393). She and Jewel rode along to the hotel with Strickland and saw him give the gun to a man, whom he said was his friend "Levi" (T 396). Jewel Sapp testified Strickland told them the man he gave the gun to was Aldridge (T 400, 404).

Strickland testified that after he gave the gun to Petitioner, he went home and went to bed (T 350). He was awakened later when a call came for another resident of the house, and she asked him to give her a ride to the hospital (T 351). This occurred around midnight, and he got back home at 1:00 a.m. (T 351-352). Lillie King corroborated the alibi; she testified Strickland woke her

at 11:50 p.m. because she had a call, and she then rode to the hospital with Strickland (T 407-408). They were at the hospital until about 12:30 a.m. and Strickland then drove them to a grocery parking lot to pick up her boyfriend's car (T 409).

Strickland testified the Petitioner called him about 1:30 a.m. and said he had had to kill a man (T 352). The following morning, the Petitioner called Strickland again and said they should go get the gun (T 353). They picked it up at Central Truck Lines (T 355). Joyce Marshall, a security guard, testified she saw a white Chrysler (the kind of car the Petitioner owned) pull off from Central Trucking at about 1:00 a.m. on September 3 (T 279-280). The Petitioner appeared to be the driver (T 283). The car headed right towards her, so she pulled out her gun, and the car took off (T 282). The Petitioner told Strickland he shot the victim three times because he had tried to pull off his mask (T 355, 383). In fact, three spent shotgun shells were recovered at the scene (T 271) within a ten-foot radius of the body (T 489). Strickland testified he disposed of the gun (T 357), but subsequently he showed the police where it was (T 374). It was recovered from a canal (T 490), and conclusively proved to be the murder weapon (T 482).

Therefore, the State's case was strong because Strickland's testimony, which directly implicated the Petitioner, was corroborated. According to Strickland, Petitioner said he shot the victim three times; three spent shells were recovered from the scene. Strickland said they recovered the gun from Central Trucking; Petitioner was seen there shortly after the time of the murder and when stopped by the police at 2:00 a.m., he did not have the shotgun in his possession. Strickland had a confirmed alibi for the time of the murder. By contrast, the defense

attorneys knew at the time of the trial that Petitioner's alibi could not be corroborated; Jo Ann DeSamarais had given them statements on September 30, 1974 and December 12, 1974, that the Petitioner was in her bar between 12:40 and 1:00 a.m. on September 3 (RH 244; 247). Since the murder occurred between 12:05 and 12:14, her testimony would not have corroborated the Petitioner's testimony that he was at her bar from 11:00 p.m. until 1:30 a.m. (T 517-518). Of course, the independent evidence that the Petitioner previously worked at the restaurant and was familiar with its operations, his prior statements that he planned to rob it,[1] and the large amount of money on his person shortly after the time of the murder[2] further confirms the Petitioner's guilt.

The Petitioner's attempt to show prejudice amounts to no more than speculation. Although in 1981, he was afforded a full and fair evidentiary hearing on the ineffectiveness claim, the Petitioner was unable to show any actual prejudice, and he has not to date. Not only the Eleventh Circuit, but every court which has considered the case has so found. The trial court entered an order which states:

> [Petitioner] has not shown that this specific deficiency of trial counsel's failure to take pretrial depositions upon oral examination of the State's main witnesses, when considered under the circumstances of this individual case, was substantial enough to demonstrate a prejudice to the defendant to the extent that there is a likelihood that this deficient conduct effected [sic] the outcome of the trial.

(RH 77). The Florida Supreme Court concluded:

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[1]Even if the testimony of James Sapp, a fellow inmate, is set aside, the same information was testified to by Annie Mae Edwards, a cook at the restaurant.

[2]Although he had a D.O.C. receipt for $558.58, Petitioner had spent $200 on a car and been out of prison for several days so it is unlikely he would still have had $500-$600 remaining.

> In our view, the record clearly fails to 'demonstrate a prejudice to the extent that there is a likelihood that the deficient conduct affected the outcome of the court proceedings.' Appellant has made no attempt whatsoever to present any evidence to indicate what information would have been elicited in taking the depositions which would have affected the outcome of his trial.

Aldridge v. State, supra, 425 So.2d at 1136. The district court held:

> . . . Aldrich has failed to meet his burden on the second prong of the Sixth Amendment test, namely that counsel's representation at trial, even if ineffective, 'created not only a possibility of prejudice, but that it worked to his actual and substantial disadvantage' [citations omitted]. Because the court is not convinced that Aldrich's situation at trial would have been materially improved had counsel taken those steps that Petitioner asserts should have been taken, the petition must be denied on this ground.

(RA 597-598).

The issue before the court below was whether there is a reasonable probability the fact-finder would have had a reasonable doubt respecting guilt, absent counsel's purported errors, and in view of the totality of the evidence. Strickland v. Washington, ___ U.S. ___, 80 L.Ed.2d 674, 698 (1984). The Petitioner's assertion that United States v. Bagley, ___ U.S. ___, 87 L.Ed.2d 481 (1985), should somehow control this claim, is incorrect, for in Bagley the court adopted the Strickland formulation to be used for judging materiality under Brady v. Maryland, 373 U.S. 83 (1963), when the State has failed to disclose evidence favorable to an accused. In this case, Strickland is directly on point and pursuant to that decision, the Eleventh Circuit correctly determined that the Petitioner failed to show prejudice.

II.

THE STATE AND FEDERAL COURTS HAVE PROPERLY FOUND THAT PROCEDURAL DEFAULT BARS THE PETITIONER'S CLAIM REGARDING THE SENTENCER'S ALLEGED FAILURE TO CONSIDER A NON-STATUTORY MITIGATING CIRCUMSTANCE.

The Petitioner claims the purported non-statutory mitigating factor of "residual doubt" was not considered by the sentencer. This Court's decisions in Skipper v. South Carolina, ___ U.S. ___, 39 Cr.L. 3041 (1986) and Lockhart v. McCree, ___ U.S. ___, 39 Cr.L. 3085 (1986) do not compel the conclusion that residual doubt is an appropriate mitigating factor. Skipper v. South Carolina holds a defendant's disposition to make a peaceful adjustment to prison is an aspect of his character relevant to the sentencing process, so it is factually not on point. In Lockhart v. McCree, the majority opinion notes that not all states allow residual doubt to be argued at sentencing. The opinion in no way indicates that such a policy violates the Eighth Amendment.

If a case regarding this issue is taken for review by the court,[3] it should not be this one, for every court considering the matter has consistently found it to be barred by procedural default. The procedural default is an entirely independent and adequate ground, so certiorari is inappropriate.

The Eleventh Circuit succinctly outlined the procedural history of this issue in its opinion:

> Aldrich expressly requested at sentencing that no mitigating circumstances be presented to the jury, stating he preferred the death penalty to spending more time in prison. On direct appeal, the Florida Supreme Court stated 'the trial court found no mitigating

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[3] In that regard, certiorari has been denied in Florida cases. Buford v. State, 403 So.2d 943 (Fla. 1981), cert. denied, 454 U.S. 1163 (1982); Burr v. State, 466 So.2d 1051 (Fla.), cert. denied, ___ U.S. ___, 88 L.Ed.2d 170 (1985); Heiney v. Florida, ___ U.S. ___, 83 L.Ed.2d 237 (1984).

> circumstances and Aldridge does not contest that finding on appeal' . . . When Aldrich attempted to raise the claim for the first time in his motion for post-conviction relief, the trial court denied relief on the basis that the grounds raised 'have already been presented or should have been presented on direct appeal.' The Florida Supreme Court affirmed the denial of relief [on this issue] . . . The district court correctly held that there was a procedural default under Wainwright v. Sykes [433 U.S. 72 (1977)].

Aldrich v. Wainwright, 777 F.2d 630, 638-639 (11th Cir. 1985).

Thus, the procedural default was correctly determined by the Eleventh Circuit to bar federal habeas corpus review on the merits, since no cause and prejudice was shown. Aldrich expressly made it clear to his attorney and to the trial court that he did not want to present anything in mitigation because he would prefer the death penalty to life in prison (TH 215-216; R 65). Accordingly, defense counsel stated to the jury:

> As I indicated, ladies and gentlemen, my client has not asked for me to plead for an advisory opinion for life imprisonment. Under the statute, as Mr. Stone has made out, on a capital offense such as this, a life sentence requires the serving of--a mandatory serving of a minimum of twenty-five calendar years before even being eligible for parole. Mr. Aldridge has spent ten years in the state prison. He has no desire to spend the rest of his life there. He has, therefore, asked me and I will accede to his wishes and not request that there be mitigating circumstances presented.

(T 746).

After the jury returned its recommendation of death, and prior to the imposition of sentence, the Petitioner and his attorneys advised the judge they had nothing to say on the Petitioner's behalf (T 755). There was never any attempt on the Petitioner's part to argue that a non-mitigating factor of residual doubt existed. This issue was never raised until the filing of the

Petitioner's motion for post-conviction relief in November, 1979, almost five years after the trial. Therefore, the Eleventh Circuit correctly concluded that consideration of the Petitioner's claim was foreclosed, and there was no cause to excuse the default, pursuant to the controlling authority of Wainwright v. Sykes, supra. See also, Engle v. Issac, 456 U.S. 107 (1982); United States v. Frady, 456 U.S. 152 (1982); Reed v. Ross, ___ U.S. ___, 82 L.Ed.2d 1 (1984). The petition for certiorari thus does not meet any of the considerations governing review enumerated in Rule 17 of the Supreme Court Rules (1980), and it should be denied.

CONCLUSION

Wherefore, based on the foregoing reasons and authorities cited therein, the Respondent requests that the petition for certiorari be denied.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Joy B. Shearer, hereby certify that I am a member of the Bar of the Supreme Court of the United States and that I have served copies of the Respondent's Brief in Opposition to Petition for Writ of Certiorari in the above case to counsel for Petitioner, by depositing same in the United States Mail, first-class postage prepaid, addressed as follows:

Craig S. Barnard, Esquire
Chief Assistant Public Defender
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All parties required to be served have been served. Done this 18th day of June, 1986.

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